a method for choosing an error proofing technique to fit a given application, or storing an error proofing technique within a database.

Mora et al. describe a method of providing a computer-aided project notebook for use on a computer system that is programmed with collaboration software 11. The notebook software guides users in assembling documentation, in notebook form, for a project the users are collectively undertaking. More specifically, the software enables users to fill in, modify, approve, baseline, and version all documents associated with a particular project. A database 11b stores forms for documents comprising the notebook. More specifically, the notebook includes a plurality of documents based on predefined job criteria, such as production readiness, critical design review, and training analysis. Each of the specific documents is assembled using predefined templates. For example, Mora et al. describe that at least one template includes a sample training lesson (see column 19, lines 22-24), at least one other template that creates a documented design (see column 21, line 56- column 22, line 28) which includes information regarding specific designs, and at least one other template that documents the project status to enable design review to be accomplished (see column 19, line 63 - column 20, line 15). Notably, however, Mora et al. do not describe nor suggest an apparatus or a method for choosing an error proofing technique to fit a given application, or storing an error proofing technique within a database.

Amstein et al. describe a client/server system which enables a user, through a Web server, to access a client machine which performs authoring operations on information for an on-line service. The authoring operations to be performed can include storing, creating or modifying information, such as documents, scripts, and Meta-information, or information about information, services, documents, and scripts on the server. More specifically, the Meta-information includes information about a particular web document object, such as the title of the document, the author, and the date and time that the document was created and modified. Other stored information may include a listing of error messages generated in response to user requests. Notably, Amstein et al. do not describe nor suggest an apparatus or a method for choosing an error proofing technique to fit a given application, or storing an error proofing technique within a database.

Applicants respectfully submit that the Section 103 rejection of the presently pending claims is not a proper rejection. As is well established, the mere assertion that it would have

been obvious to one of ordinary skill in the art to have modified Hobbs to obtain the claimed recitations of the present invention does not support a prima facia obvious rejection. Rather, each allegation of what would have been an obvious matter of design choice must always be supported by citation to some reference work recognized as standard in the pertinent art and the Applicants given the opportunity to challenge the correctness of the assertion or the notoriety or repute of the cited reference.

Furthermore, in contrast to the assertion within the Office Action, Applicants respectfully submit that it would not be obvious to one skilled in the art to have modify Hobbs because the Examiner has not pointed to any prior art that teaches or suggests to modify Hobbs obtain the claimed invention, other than Applicants' own teaching. Only the conclusory statement that "[o]ne of ordinary skill in the art would have been motivated to modify Hobbs with the teaching of Mora and Amstein that error proofing and concepts of the tolerance for errors at near-zero levels are very important because potential errors have a devastating impact downstream." suggests modifying Hobbs. Applicants respectfully submit however, that the prior art teaches away from the present invention. More specifically, none of the prior art cited describe or suggest an apparatus or a method for choosing an error proofing technique to fit a given application, or storing an error proofing technique within a database.

Additionally, it is impermissible to use the claimed invention as an instruction manual or "template" to piece together the teachings of the cited art so that the claimed invention is rendered obvious. Specifically, one cannot use hindsight reconstruction to pick and choose among isolated disclosures in the art to deprecate the claimed invention. Further, it is impermissible to pick and choose from any one reference only so much of it as will support a given position, to the exclusion of other parts necessary to the full appreciation of what such reference fairly suggests to one of ordinary skill in the art. The present Section 103 rejection is based on a combination of teachings selected from multiple patents in an attempt to arrive at the claimed invention. Specifically, Hobbs is cited for its teaching of a client system including a server and a plurality of servlets, Mora et al. is cited for its teaching of database tables including at least one error proofing example, and Amstein et al. is cited for its teaching of database tables including meta-data. Since there is no teaching nor suggestion in the cited art for the claimed combination, the Section 103 rejection appears to be based on a hindsight reconstruction in which isolated disclosures have been picked and chosen in an

attempt to deprecate the present invention. Of course, such a combination is impermissible, and for this reason alone, Applicants request that the Section 103 rejection of Claims 1-20 be withdrawn.

In addition, none of Hobbs, Mora et al., nor Amstein et al., considered alone or in combination, describe or suggest the claimed combination. Specifically, Claim 1 recites a system comprising "a plurality of clients...a server comprising a plurality of servlets, at least some of said servlets providing at least one of a database and server access capability to each said client...said database comprising a plurality of tables, at least one of said tables comprising at least one error proofing example and meta-data defined by a user when creating an error proofing example...." Specifically, none of Hobbs, Mora et al., nor Amstein et al., considered alone or in combination, describe or suggest a table including at least one error proofing example, and meta-data defined by a user when creating an error proofing example. Accordingly, for at least the reasons set forth above, Claim 1 is submitted to be patentable over Hobbs in view of Mora et al., and further in view of Amstein et al.

Claims 2-12 depend, directly or indirectly, from independent Claim 1. When the recitations of Claims 2-12 are considered in combination with the recitations of Claim 1, Applicants submit that dependent Claims 2-12 likewise are patentable over Hobbs in view of Mora et al., and further in view of Amstein et al.

Claim 13 recites a method for identifying an error proofing technique for a given application using a web-based system, wherein the system includes a plurality of clients including a plurality of user interface classes, and a database including a plurality of tables including at least one example of an error proofing technique and user defined meta-data, and wherein the method comprises the step of "choosing an error proofing technique to fit the given application." Specifically, none of Hobbs, Mora et al., nor Amstein et al., considered alone or in combination, describe or suggest using a web-based system that includes a database including at least one example of an error proofing technique, or a method for identifying an error proofing technique for a given application including the step of choosing an error proofing technique to fit a given application. Accordingly, for at least the reasons set forth above, Claim 1 is submitted to be patentable over Hobbs in view of Mora et al., and further in view of Amstein et al.

Claims 14-20 depend, directly or indirectly, from independent Claim 13. When the recitations of Claims 14-20 are considered in combination with the recitations of Claim 13, Applicants submit that dependent Claims 14-20 likewise are patentable over Hobbs in view of Mora et al., and further in view of Amstein et al.

For the reasons set forth above, Applicants respectfully request that the Section 103 rejection of Claims 1-20 be withdrawn.

In view of the foregoing amendments and remarks, all the claims now active in this application are believed to be in condition for allowance. Reconsideration and favorable action is respectfully solicited.

Respectfully Submitted,
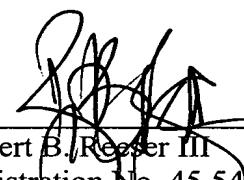
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